

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JONI WRIGHT, individually and on behalf of all others similarly situated,	:	
	:	Civil Action No.: 10-431 (ACR)
Plaintiffs,	:	
	:	
v.	:	
LEHIGH VALLEY HOSPITAL AND HEALTH NETWORK, LEHIGH VALLEY HOSPITAL,	:	
LEHIGH VALLEY HOSPITAL – MUHLENBERG,	:	
LEHIGH VALLEY HOSPITAL – 17 TH STREET,	:	
AND LEHIGH VALLEY HOSPITAL – CEDAR CREST,	:	
	:	
Defendants.	:	

**CLASS COUNSEL'S MOTION FOR AN ORDER
AWARDING ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

Class Counsel for the Class Representatives, Joni Wright and Lenia Rexrode, and the Settlement Class comprised of all non-exempt registered nurses employed by Defendants in the Patient Care Services Division from January 20, 2008 through May 18, 2012, who were allegedly not compensated for all time worked, hereby move before this Honorable Court for an Order:

1. Awarding attorneys' fees in the amount of 40 percent of the Settlement Amount of \$4.5 million (\$1,800,000.00); and
2. Reimbursing Class Counsel for expenses totaling \$43,339.03.

Class Counsel's arguments in support of this Motion are more fully explained in the accompanying Memorandum of Law and attached exhibits, which are incorporated into this Motion by reference, as well as Plaintiffs' Motion for Final Approval of the

Settlement and accompanying Memorandum of Law which has also been filed with the Court.

SOBOL, SOBOL & MURPHY, P.C.

By: /s/ Michael Murphy
Michael Murphy, Esquire
Martin J. Sobol, Esquire
Daniel J. Sobol, Esquire
1760 Market Street, Suite 1200
Philadelphia, PA 19103
(215) 988-0193
Fax: (215) 988-0193

Dated: July 9, 2012

CERTIFICATE OF SERVICE

I, Michael Murphy, Esquire, hereby certify that on July 9, 2012, I caused a true and correct copy of the foregoing to be filed via ECF filing, which will send notification of such filing to the following counsel:

A. James Johnston, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103

Andrew W. Allison, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103

Darren M. Creasy
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103

Jonathan B. Sprague
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103

Glenn Guanowsky, Esquire
General Counsel
Lehigh Valley Hospital and Health Network
(Mailing Address Unknown)

/s/ Michael Murphy
Michael Murphy

Dated: July 9, 2012